IN THE CIRCUIT COURT OF [*county*] COUNTY, WEST VIRGINIA

STATE OF WEST VIRGINIA,

v. [*case number*]

Hon. [*name*]

[*name-all caps*],

Defendant.

**MOTION FOR WORK RELEASE**

On this date came Defendant, [n*ame]*, by Counsel, [*counsel’s name*], and moved the Honorable Court, pursuant to West Virginia Code, § 62-11A-1, et. seq., grant to Defendant the privilege of leaving [*jail or home incarceration*] during all necessary and reasonable hours to work at [*his/her*] employment.

In support of this motion, Defendant asserts that [*he/she*] has been sentenced to a term of confinement of [*length of jail or home incarceration sentence*] for the offense of [*nature of offense*]; that [*he/she*] is gainfully employed by [*employer and address of employer*]; and that it would be in the interest of justice to permit Defendant to continue such employment during [*his/her*] period of incarceration.

Therefore, Defendant requests that the Honorable Court grant the relief requested in this motion and permit Defendant to work at [*his/her*] regular employment during the term of confinement.

Dated the \_\_\_ day of [*month, year*].

[*defendant*],

By Counsel

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

[*counsel name*] [*bar number*]

[*address*]

[*phone number*]

[*email address*]

Counsel for Defendant